### Exhibit B

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

IN RE:	§	
	§	CASE NO. 20-10410-hcm
3443 ZEN GARDEN, L.P.	§	
ALLEGED DEBTOR	§	

# DECLARATION OF JAMES N. MORRIS IN SUPPORT OF OBJECTION TO POST-PETITION FINANCING

I, James N. Morris, being duly sworn, state the following under penalty of perjury:

- 1. I am the President at ACM Services, LLC., a commercial electrical contractor with offices in Taylor, Texas ("ACM"). I submit this declaration ("Declaration") in support of the Objection to Post-Petition Financing. I have been personally involved in all facets of ACM's involvement in the improvements located at 3443 Ed Bluestein Boulevard in Austin, Texas (the "Project") and I have personal knowledge or the facts stated herein.
- 2. I received my degree in Electrical Engineering from the University of Texas in 1989. I have also been a licensed Master Electrician since 1989, and my license has been in continuous good standing with the State of Texas since that time. My work history includes designing and engineering electrical systems for Tom Green & Co., a PE firm in Austin, Texas. I founded ACM in or around 2004 and have operated that company continuously since that time. Projects completed under my supervision and/or with my personal labor include industrial, retail, commercial and environmental facilities. Exemplar projects include
  - Tasus, a design-build project for a manufacturer of Toyota parts in Georgetown,
     Texas;
  - b. An office building known a Research Park Plaza Bldg 5;
  - c. Sams Club (2)

- d. Wal Mart
- e. HEB-2
- f. Wolf Crossing Retail Center
- g. A Volvo car dealership.
- 3. My services through ACM include design, installation, and maintenance of electrical projects throughout Central Texas.

### The Lien

- 4. ACM Services, LLC entered into contracts with Panache Development & Construction, Inc. ("Panache") the General Contractor and Debtor on the project generally known as the Motorola Campus. The scope of work undertaken by ACM Services, LLC can be generally described as the installation of electrical components necessary for utility services at the Project as well as an ongoing maintenance agreement for the electrical system.
- 5. On or about October 10, 2019, I caused to be served a Notice of Unpaid Balance on Panache and Debtor nonpayment of invoices for the months of July, August, and September, 2019. A true and correct copy of said notice is attached hereto as Exhibit "A".
- 6. On or about November 13, 2019, I caused to be an Affidavit of Claim for Mechanic's Lien on behalf of ACM as Official Public Document No. 2019178762. A true and correct copy of said lien is attached hereto as Exhibit "B". Unpaid work and materials were installed as per the terms of the contract with Panache, payment is past due, and the hen amount remains unsatisfied.

### Removable Equipment

7. Components installed which the Court should allow ACM to remove are listed on Exhibit "C". None of the components scheduled to be removed nor the freehold from which it is removed will be injured by the physical act of removal. Each of the components listed

herein are separable component parts which can be unbolted, disconnected or unplugged from the mount or fixture it is attached to with slight risk of damage to the remaining fixtures or freehold which cannot be removed. Each of the removable component(s) can be replaced by replacing the removed part. As such, there is little of injury to the land or pre-existing improvements. True and correct photographs of the components, where available, are attached hereto as Exhibits "C-1" through "C-8" and the numbers in the exhibits correlate with the line numbers of Exhibit "C". The photographs fairly and accurately show the particular component listed and the manner in which it is installed. The items depicted in the photographs fairly depict the component listed under the corresponding line number of Exhibit "C".

DATED: June <u>9</u>, 2020

James N. Morris, President

ACM Services, LLC

SUBSCRIBED AND SWORN TO BEFORE ME, on this \_\_\_\_\_ day of June, 2020.

Notary Public in and For the State of Texas

CATHERINE DICKSON
Notary Public, State of Texas
Comm. Expires 07-13-2020
Notary ID 130737700

# SNEED, VINE & PERRY

A PROFESSIONAL CORPORATION ATTORNEYS AT LAW ESTABLISHED 1926

108 EAST 8th STREET **GEORGETOWN, TEXAS 78626** 

TELEPHONE (512) 930-9775 TELECOPIER (512) 819-9707

WEBSITE:www.sneedvine.com EMAIL:cstanley@sneedvine.com

**Board Certified - Construction Law Texas Board of Legal Specialization** 

October 10, 2019

# VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED 7019 0700 0000 9576 2678

Panache Development & Construction, Inc. P.O. Box 26539 Austin, Texas 78755

### VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED 7019 0700 0000 9576 3248

3443 Zen Garden Limited Partnership 3443 Ed Bluestein Blvd. Austin, Texas 78721

### RE: Demand for Payment - Notice of Intent to Suspend Work

Invoice 4655 - \$33,860.65 Building H Invoice 4656 - \$37,730.00 Building J Building H Invoice 4676 - \$16,165.00 Invoice 4677 - \$37,947.50 Building J Invoice 4718 - \$28,697.75 Building C Invoice 4719 - \$47,620.00 Building H Invoice 4720 - \$39,500.00 Building J

### To Whom It May Concern:

The undersigned represents ACM Services, LLC, ("Claimant") which has furnished labor and/or materials to Panache Development & Construction, Inc ("Panache"). Panache is represented to be the owner of the project in its contracts with ACM, so it is at the very least a purported owner. Travis County real property records indicate the owner to be 3443 Zen Garden Limited Partnership and is thus included on this notice. Claimant has not been paid the amounts due to it, under its subcontract with your original contractor, for the month(s) of July, August and September, 2019 in the aggregate amount of \$241,520.90, as shown by the invoice(s) attached to this letter and herein incorporated by this reference.

Under the mechanic's lien laws of Texas, an original contractor, which we claim to be, has broad rights in perfecting a lien claim against the subject property(s). Alternatively, as a first-tier subcontractor furnishing material or labor in connection with a non-residence construction project, ACM is required to notify the owner and original contractor of all claims

> GEORGETOWN AUSTIN

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Panache Development & Construction, Inc. 3443 Zen Garden Limited Partnership October 10, 2019 Page 2

that are not paid by the 15th day of the third calendar month following each month in which unpaid labor was done or material was delivered in whole or in part by the subcontractor. Failure to give this notice would cause a claimant to lose his or her rights under the mechanic's lien laws.

The law further requires that Claimant advise (and we hereby advise you) that if the claim remains unpaid, the owner may be personally liable and the owner's property subjected to a lien unless the owner withholds payments from the contractor for payment of the claim or the claim is otherwise paid or settled.

Please consider this a demand for payment of the aforementioned unpaid balance, which is an accrued obligation or is past due under the terms of our subcontract with your original contractor.

You are also advised that all of the claim has accrued under Tex. Prop. Code §53.053 or is past due according to the agreement between the parties.

Panache is further advised that it does not have an effective contingent payment clause in its contracts with ACM and demand is made against Panache for full payment. To the extent that there is an effective payment clause (which ACM denies) ACM provides this notice that ACM objects to the further enforceability of the contingent payment clause in each of the contracts involving the work referenced above as provided for in Tex. Bus. & Comm. Code §56.052.

Finally, and pursuant to Tex. Prop. Code §28.009 all parties are advised that the payment described herein has not been received and ACM intends to suspend performance for nonpayment in ten (10) days.

Should you have any question concerning this claim, please contact the undersigned.

Sincerely,

Sneed, Vine & Perry, P.C.

By: Christopher Stanley

CBS:lf

Encl: Invoices referenced

cc: Client

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**ACM SERVICES LLC** 

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #
7/26/2019	4655

Bill To

PANACHE DEVELOPMENT & CONSTRUCTION INC.
P.O. BOX 26539
AUSTIN, TX 78755

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
Quantity	Description  BUILDING H ELECTRICAL DRAW  TAXABLE LABOR Sales Tax	94,000.00 10,000.00 8.25%	94,000.00 10,000.00T 825.00

Regulated by the Texas Department of Licensing & Regulation. P.O. Box 12157

Austin, TX 78711 1-800-803-3902 512-463-6599 Website:

www.license.state.tx.us/complaints

**Total** 

\$104,825.00

and #70,964.2

\$ 33,860.65

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**ACM SERVICES LLC** 

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #
7/26/2019	4656

Bill To
PANACHE DEVELOPMENT & CONSTRUCTION INC.

P.O. BOX 26539 AUSTIN, TX 78755

P.O. No.	Terms	Project
	Due on receipt	

Quantity Description	Rate	Amount
BUILDING J ELECTRICAL DRAW TAXABLE LABOR Sales Tax	Rate  33,400.00 4,000.00 8.25%	33,400.00 4,000.00 330.00

Regulated by the Texas Department of Licensing & Regulation.

P.O. Box 12157 Austin, TX 78711 1-800-803-3902 512-463-6599

Website: www.license.state.tx.us/complaints

**Total** \$37,730.00

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**ACM SERVICES LLC** 

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #
8/23/2019	4676

Bill To

PANACHE DEVELOPMENT & CONSTRUCTION INC. P.O. BOX 26539 AUSTIN, TX 78755

P.O. No.	Terms	Project
	Due on receipt	EIGHTFOLD

Quantity	Description	Rate	Amount
1 BUILI	DING H ELECTRICAL DRAW DING H TAXABLE LABOR	14,000.00 2,000.00 8.25%	14,000.00 2,000.007 165.00

Regulated by the Texas Department of Licensing & Regulation.

P.O. Box 12157 Austin, TX 78711 1-800-803-3902 512-463-6599

Website: www.license.state.tx.us/complaints

**Total** \$16,165.00

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ACM SERVICES LLC

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #
8/23/2019	4677

Bill To

PANACHE DEVELOPMENT & CONSTRUCTION INC.
P.O. BOX 26539
AUSTIN, TX 78755

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
1 B	UILDING J ELECTRICAL DRAW UILDING J TAXABLE LABOR ales Tax	34,700.00 3,000.00 8.25%	34,700.00 3,000.00 247.50

Regulated by the Texas Department of Licensing & Regulation.

P.O. Box 12157 Austin, TX 78711 1-800-803-3902 512-463-6599 Website:

www.license.state.tx.us/complaints

**Total** \$37,947.50

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ACM SERVICES LLC

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #		
9/24/2019	4718		

Bill To

PANACHE DEVELOPMENT & CONSTRUCTION INC. 4210 SPICEWOOD SPRINGS RD., STE. 205 AUSTIN, TX 78759

P.O. No.	Terms	Project	
	Due on receipt	21 BUILDING C	

Quantity	Description	Rate	Amount
1 FHJ COR	F. AND SHELL	28,697.75	28,697.7
		Total	\$28,697.7

Regulated by the Texas Department of Licensing & Regulation.

P.O. Box 12157 Austin, TX 78711 1-800-803-3902

512-463-6599 Website:

www.license.state.tx.us/complaints

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**ACM SERVICES LLC** 

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #		
9/24/2019	4719		

PANACHE DEVELOPMENT & CONSTRUCTION INC.
P.O. BOX 26539
AUSTIN, TX 78755

P.O. No.	Terms	Project	
	Due on receipt	EIGHTFOLD	

Quantity	Description	Rate	Amount
	Description  H ELECTRICAL DRAW	Rate 47,620.00	47,620.00

Regulated by the Texas Department of Licensing & Regulation.

P.O. Box 12157 Austin, TX 78711 1-800-803-3902 512-463-6599

Website: www.license.state.tx.us/complaints

**Total** \$47,620.00

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ACM SERVICES LLC

3280 FM 112 TAYLOR, TX 76574 TECL#19676

Date	Invoice #
9/24/2019	4720

Bill To PANACHE DEVELOPMENT & CONSTRUCTION INC. P.O. BOX 26539 AUSTIN, TX 78755

Quantity	Description	Rate	Amount
1 BUILDI	NG J ELECTRICAL DRAW	39,500.00	39,500.0
		Total	\$39,500.00

Regulated by the Texas Department of Licensing & Regulation.

P.O. Box 12157 Austin, TX 78711 1-800-803-3902 512-463-6599

Website:

www.license.state.tx.us/complaints

OFFICIAL PUBLIC RECORDS

Dana DeBeauvoir, County Clerk Travis County, Texas Nov 13, 2019 03:56 PM Fee: \$38.00 2019178762

\*Electronically Recorded\*

# This page is intentionally added for electronic file stamp.

# FIRST-TIER SUBCONTRACTOR AFFIDAVIT OF CLAIM FOR MECHANIC'S LIEN

### STATE OF TEXAS

# COUNTY OF Williamson

BEFORE ME, the undersigned authority, on this day personally appeared Lisa Morris and, upon oath, after first being duly sworn, deposed and stated:

"My name is Lisa Morris and I am the authorized representative of ACM Services, hereinafter referred to in this affidavit as "Claimant". The facts set forth herein are true and correct, and I am competent and authorized to make this affidavit.

Pursuant to a subcontract between Claimant and Panache Development & Construction, Inc. (herein called "Original Contractor"), whose address is PO Box 26539, Austin, TX 78755, Claimant performed labor and delivered materials in connection with the construction or repair of improvements to the "Property" (herein so called) identified as

TRACT 1: Lot 1A-B, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

TRACT 2: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Easement Agreement for Emergency Reciprocal Access, dated November 15, 2006, by and between Freescale Semiconductor, Inc. and Hewlett-Packard Company, recorded in Document No. 2006222165, Official Public Records, Travis County, Texas; over and across those portions of Lot 1A, and 2A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 2006000304, Official Public Records, Travis County, Texas, now known as Lot 1A-A, and Lot 1A-B, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

TRACT 3: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Reciprocal Access Agreement for Landscape and Building Maintenance, dated November 15, 2006, by and between Freescale Semiconductor, Inc. and Hewlett-Packard Company, recorded in Document No. 2006222167, Official Public Records, Travis County, Texas; over and across those portions of Lot 1A, and 2A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 2006000304, Official Public Records, Travis County, Texas, now known as Lot 1A-A, and Lot 1A-B, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

TRACT 4: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Ingress and Egress, dated August 10, 2012, by and between MFPB Ed Bluestein LLC and Freescale Semiconductor, Inc., recorded in Document No. 2012132396, Official Public Records, Travis County, Texas; over and across those

portions of Lot 1A-A, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

TRACT 5: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Parking Spaces Easement Agreement, dated August 10, 2012, by and between Freescale Semiconductor, Inc., and MFPB Ed Bluestein LLC, recorded in Document No. 2012132397, Official Public Records, Travis County, Texas; all rights therein to the use of the parking spaces located on the third and fourth floors shown as G-1 in EXHIBIT "B" of Agreement. Said Parking Garage located on Lot 1A-A, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No.200900045, Official Public Records, Travis County, Texas.

TRACT 6: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Stairwell Ingress and Egress Access Easement, dated August 10, 2012, by and between Freescale Semiconductor, Inc., and MFPB Ed Bluestein LLC, recorded in Document No. 2012132398, Official Public Records, Travis County, Texas; all rights therein to the use of the stairwell shown in EXHIBIT "A" of Agreement. Said stairwell located on Lot 1A-A, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

TRACT 7: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Reciprocal Easement Agreement for Access through Doorway to Buildings K and L, dated August 10, 2012, by and between Freescale Semiconductor, Inc., and MFPB Ed Bluestein LLC, recorded in Document No. 2012132400, Official Public Records, Travis County, Texas; all rights therein to the access use of the doorway shown in EXHIBIT "B" of Agreement. Said doorway located on Lot 1A-A, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

TRACT 8: Non-Exclusive Easement Estate appurtenant to Tract 1 created pursuant to that certain Reciprocal Easement Agreement for Access to Trails and for Lot Line Maintenance, dated August 10, 2012, by and between Freescale Semiconductor, Inc., and MFPB Ed Bluestein LLC, recorded in Document No. 2012132399, Official Public Records, Travis County, Texas; all rights therein to the pedestrian access over and across the trails currently existing as shown in EXHIBIT "A" of Agreement; all rights therein for landscaping and maintenance. Said trails located on Lot 1A-A, RESUBDIVISION PLAT OF LOT 1A, RESUBDIVISION PLAT OF LOT 1, MOTOROLA INC. ED BLUESTEIN FACILITY, according to the map or plat thereof, recorded in Document No. 200900045, Official Public Records, Travis County, Texas.

which work may be generally described as follows: electrical (herein referred to as the "Work"). Such Work was furnished to Original Contractor.

The owners or reputed owners ("Owner") of the Property is Panache Development & Construction, Inc., whose address is PO Box 26539, Austin, TX 78755, and 3443 Zen Garden Limited Partnership, whose address is Ed Bluestein Blvd., Austin, TX 78721.

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Claimant is a subcontractor, whose mailing address is 3280 FM 112, Taylor, Texas 76574.

The amount of \$401,520.90 remains unpaid and is due and owing to Claimant under Claimant's subcontract with Original Contractor for the Work hereinabove described. Such unpaid Work was performed during the months of July, August, September, and October, 2019. A mechanic's lien securing the payment of such amount is herein claimed by Claimant on the Property.

Notice of Claimant's claim against the Owner was sent to the Owner on the following dates and in the manner indicated below:

### **Date Notice of Claim Sent**

Method By Which Notice Sent

October 10, 2019 November 13, 2019 Certified Mail Return Receipt Requested Certified Mail, Return Receipt Requested

Further Affiant sayeth not."

Lisa Morris

authorized representative

SUBSCRIBED AND SWORN TO before me on this

\_ day of November, 2019.

Notary Public in and for the State of Texas

CATHERINE DICKSON
Notary Public, State of Texas
Comm. Expires 07-13-2020
Notary ID 130737700

# 

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	REMOVABLE ITEM	LOCATION (BUILDING & ROOM)	FUNCTION IN SYSTEM	REMOVAL PROCEDURE	DAMAGE/BUILD BACK REQUIRED	REASONING
1	2ND FLOOR SWITCHGEAR	2ND FLOOR ELECTRIC RM	SERVES AND DISTRIBUTES POWER TO 2ND, 3RD AND 4TH FLOOR	UNBOLT AND REMOVE ALL FEEDERS, TRANSPORT GEAR BY DOLLIES TO PARKING LOT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
2	CENTRAL PLANT SWITCHGEAR	CENTRAL PLANT SOUTH WALL	SERVES CHILLERS, PUMPS AND TANK FARM	UNBOLT AND REMOVE ALL FEEDERS, TRANSPORT GEAR BY DOLLIES TO PARKING LOT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
3	CENTRAL PLANT TRANSFORMER	EXTERIOR SOUTH WALL OF CENTRAL PLANT	SERVCES CENTRAL PLANT TRANSFRORMER #2	UNBOLT AND REMOVE ALL FEEDERS, TRANSPORT GEAR BY DOLLIES TO PARKING LOT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
4	CS1 SUBSTATION	SUBSTATION	SERVES ENTIRE SITE WITH POWER	DE-ENERGIZE AND RACK OUT BREAKERS, REMOVE FUSES AND STORE IN DRAWERS	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE

ACM REMOVABLES

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	REMOVABLE ITEM	LOCATION (BUILDING & ROOM)	FUNCTION IN SYSTEM	REMOVAL PROCEDURE	DAMAGE/BUILD BACK REQUIRED	REASONING
5	1RST FLOOR ELECTRIC RM GEAR	1ST FLOOR ELECTRIC RM.	SERVES AND DISTRIBUTES POWER 1ST FLOOR	UNBOLT AND REMOVE ALL FEEDERS, TRANSPORT GEAR BY DOLLIES TO PARKING LOT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
6	FHJ ELECTRIC DISTRIBUTION YARD	NORTH EAST OF BUILDING F AND H	PROVIDES POWER TO BUILDINGS F, H AND J	UNBOLT AND REMOVE ALL FEEDERS, TRANSPORT GEAR BY DOLLIES TO PARKING LOT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
7	BUILDING LIGHTING	THROUGHOUT F, H AND J. NEW AND TEMPORARY FIXTURES	PROVIDES LIGHTING IN SPACE	REMOVE ALL LIGHT FIXTURES FROM WIRING SYSTEM. LEAVE BRANCH WIRING IN PLACE	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
8	PARKING GARAGE TRANSFORMER	NORTH SIDEWALK OF PARKING GARAGE	PROVIDES POWER TO PARKING GARAGE AND CAR CHARGERS	LIFT AND SET ON TRAILER WITH FORKLIFT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE
9	SITE ELECTRIC GRID	THROUGHOUT THE SITE	DISTRIBUTES POWER TO ALL TRANSFORMERS AND MEDIUM VOLTAGE GEAR	CUT AND REMOVE ALL CONCENTRIC CABLE INSTALLED UNDER THIS CONTRACT	NONE	NOT A STRUCTURAL COMPONENT. ALL CONDUIT AND RACEWAY WILL BE LEFT IN PLACE FOR FUTURE USE

ACM REMOVABLES

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